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NAME OF COMMITTEE (In Full)
Women for American Values and Ethics Political Action Committee
(A/K/A WAVE PAC)

FEC IDENTIFICATION NUMBER
C00635664

Mailing Address 19772 MacArthur Boulevard
Suite 240

City State ZIP Code
Irvine CA 92612

Response to RFAI dated May 12, 2019.

Women for American Values and Ethics PAC (WAVE PAC) is registered with the Federal Election Commission (FEC) as a hybrid PAC per FEC vs. Carey. Each reporting period, WAVE PAC has been calculating the allocated administrative expenses between the contributions account and the IE account. The bank accounts for each remain segregated.

The contributions account has been the primary payor to vendors for allocable administrative expenses. Throughout 2017 and 2018, at the end of each reporting period, the IE account reimbursed the contributions account its calculated share of the reporting period's allocable expenses. In 2017, WAVE PAC used the cumbersome approach of reporting all allocable expenses as if there were separate payments to the payees from each account. This approach did not reflect the actual transactions very well (because only the contributions account actually was making the payments to payees, and the IE account was only making lump sum reimbursements at the end of each reporting period). For 2018, WAVE PAC assumed it would be more accurate to report the payments as actually made by the contributions account, and further assumed that the reimbursement payments from the IE account did not need to be reported because they are internal transactions that do not affect the reported cash-on-hand balance of WAVE PAC. From the RFAI and discussions with Sara Juris, Sr. Campaign Finance & Reviewing Analyst, we now understand that this reporting method does not give the FEC a picture of how much the IE account has reimbursed the contributions account, and this has led the FEC to assume the contributions account has less funds on hand than actually is the case. The RFAI thus assumed the contribution account did not have sufficient funds on hand to cover a particular contribution to a federal candidate.

Throughout 2018, WAVE PAC's IE account reimbursed the contributions account a total of \$17,225.61 for the IE account's allocated portion of administrative expenses. Below is a breakdown of each reporting period's allocated reimbursements from the IE account to the contributions account.

- April 2018 Quarterly Report - \$2,901.99
- July 2018 Quarterly Report - \$4,496.79
- October 2018 Quarterly Report - \$5,217.40
- 2018 Pre-General Report - \$252.81
- 2018 Post-General Report - \$3,770.92
- 2018 Year-End Report - \$585.70

Going forward, WAVE PAC will notify the FEC of all IE account reimbursements to the contributions account for the PAC's allocable administrative expenses. This approach will reflect all of the actual transactions of both the contributions account and the IE account. A memo text will be included in each report showing the actual reimbursement so that the cash-on-hand balance will remain accurate.

As filed with the FEC on February 14, 2019 on FEC Form 99, WAVE PAC acknowledges it inadvertently gave an excessive contribution to Mike Levin for Congress and requested a refund from Mike Levin for Congress on February 13, 2019. The \$2,300 refund was received by WAVE PAC from Mike Levin for Congress on March 1, 2019.